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5 *Interim Lead Class Counsel*

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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**

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11 *In re Wells Fargo Mortgage Discrimination*  
12 *Litigation.*

Case No. 3:22-cv-00990-JD

Honorable James Donato

13 **DECLARATION OF DENNIS S. ELLIS IN**  
14 **SUPPORT OF JOINT STIPULATION TO**  
15 **EXTEND THE PARTIES' DEADLINES**  
16 **ON MOTION FOR SUMMARY**  
17 **JUDGMENT AND MOTIONS TO**  
18 **EXCLUDE**

[Filed concurrently with Joint Stipulation to  
Extend the Parties' Deadlines on Motion for  
Summary Judgment and Motions to Exclude;  
and [Proposed] Order]

**DECLARATION OF DENNIS S. ELLIS**

I, Dennis S. Ellis, declare and state as follows:

1. I am an attorney at law, duly admitted to practice before this Court and all courts in the State of California. I am a partner with Ellis George LLP, lead counsel and counsel of record for Plaintiffs in this matter. This declaration is being made in support of Plaintiffs' Joint Stipulation to Extend the Parties' Deadlines on Motion for Summary Judgment and Motions to Exclude pursuant to Civil Local Rule 6-2(a)(1)-(3). Except as otherwise stated, I make this declaration based on personal knowledge, and if called to do so, I could testify competently to the information set forth below.

2. On July 28, 2024, Plaintiffs' counsel proposed extending the time for Plaintiffs to file their Opposition to Wells Fargo's Motion for Summary Judgment (ECF No. 272) and Motion to Exclude Leana Golubchik (ECF No. 270) by 21 days due, in part, to the complexity of the issues and the voluminous evidence filed in support thereof.

3. On July 29, Wells Fargo's counsel agreed to Plaintiffs' proposal and requested that the deadline extensions apply to Plaintiffs' Motion to Exclude the Testimony of Dr. Manuel Adelino (ECF No. 266), Motion to Exclude Certain Testimony of Dr. Marsha J. Courchane (ECF No. 267), and Motion to Exclude the Testimony of Dr. Kristen P. Lennox, (ECF No. 268), to which Plaintiffs agreed. Wells Fargo's counsel also proposed an additional seven days for both parties to file their Replies. The parties agreed that the Oppositions to Wells Fargo's Motion for Summary Judgment and Motion to Exclude Dr. Golubchik and Plaintiffs' Motions to Exclude Drs. Adelino, Courchane, and Adelino would be due August 29, 2024. The parties also agreed that the Replies to Wells Fargo's Motion for Summary Judgment and Motion to Exclude Dr. Golubchik and Plaintiffs' Motions to Exclude Drs. Adelino, Courchane, and Adelino would be due September 12, 2024. The parties also agreed that the hearing on the aforementioned motions would be heard on October 10, 2024.

4. To date, Plaintiffs have only requested a modification of this Court's deadlines on the joint stipulation to modify the scheduling order (ECF No. 166), the joint stipulation for motion for class certification briefing schedule (ECF No. 196), and joint stipulation to reschedule July 11,

1 2024, hearing on motions, (ECF No. 257). The proposed stipulated request to enlarge time for the  
2 limited purpose of Plaintiffs' filing their Opposition to the Motion for Summary Judgment and the  
3 Motion to Exclude Dr. Golubchik and the Parties' Oppositions to the Motions to Exclude and the  
4 Parties' respective Replies will not affect any other deadlines in the matter, especially given that  
5 the requested enlargement maintains the same hearing date as noticed by Wells Fargo's Motion for  
6 Summary Judgment, and is merely 21 days more than that permitted by Civil Local Rule 7-3(a)  
7 and merely seven days more than that permitted by Civil Local Rule 7-3 (c) and equally applied to  
8 the Parties.

9 Executed this 30th day of July, 2024, at Los Angeles, California.

10 I declare under penalty of perjury under the laws of the State of California that the  
11 foregoing is true and correct.

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13 /s/ Dennis S. Ellis

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